

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY LAYDON, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

MIZUHO BANK, LTD., THE BANK OF
TOKYO-MITSUBISHI UFJ, LTD., THE
SUMITOMO TRUST AND BANKING CO.,
LTD., THE NORINCHUKIN BANK,
MITSUBISHI UFJ TRUST AND BANKING
CORPORATION, SUMITOMO MITSUI
BANKING CORPORATION, RESONA
BANK, LTD., J.P. MORGAN CHASE & CO.,
J.P. MORGAN CHASE BANK, NATIONAL
ASSOCIATION, J.P. MORGAN
SECURITIES PLC, MIZUHO CORPORATE
BANK, LTD., CHUO MITSUI TRUST &
BANKING CO. LTD., DEUTSCHE BANK
AG, MIZUHO TRUST AND BANKING CO.,
LTD., THE SHOKO CHUKIN BANK, LTD.,
SHINKIN CENTRAL BANK, UBS AG, UBS
SECURITIES JAPAN LTD., THE BANK OF
YOKOHAMA, LTD., SOCIETE GENERALE
SA, THE ROYAL BANK OF SCOTLAND
GROUP PLC, ROYAL BANK OF
SCOTLAND PLC, BARCLAYS BANK PLC,
CITIBANK, NA, CITIGROUP, INC.,
CITIBANK, JAPAN LTD., CITIGROUP
GLOBAL MARKETS JAPAN, INC.,
COÖPERATIEVE CENTRALE
RAIFFEISEN-BOERENLEENBANK B.A.,
HSBC HOLDINGS PLC, HSBC BANK PLC,
ICAP PLC, R.P. MARTIN HOLDINGS
LIMITED AND JOHN DOE NOS. 1-50,

Defendants.

**Case No. 12-cv-3419 (GBD)
(HBP)**

ECF Case

DECLARATION OF ANDREW J. CALICA

Pursuant to 28 U.S.C. § 1746, Andrew J. Calica hereby declares:

1. I am a partner with the law firm Mayer Brown LLP, counsel for Defendant Société Générale in the above-captioned action. I submit this declaration in support of Defendants' Memorandum of Law In Support of Defendants' Japanese Data Privacy Law Objections filed contemporaneously herewith.
2. Attached hereto as Exhibit A is a true and correct copy of the Japanese Financial Services Agency's English translation of its original Guidelines for Personal Information Protection in the Financial Industries.
3. Attached hereto as Exhibit B is a true and correct copy of an English translation of the Supreme Court of Japan's decision in Saikō Saibansho [Sup Ct.] Sept. 12, 2003, Hei 15 (kyo) No. 8, 57 Saikō Saibansho Minji Hanreishū 937 (Japan), available at http://www.courts.go.jp/app/hanrei_en/detail?id=650.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
August 6, 2015

/s/ Andrew J. Calica

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Société Générale*